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January 9, 2023

**BY ECF** 

The Honorable John P. Cronan United States District Judge United States District Court Southern District of New York 500 Pearl Street, Room 1320 New York, NY 10007 The request is granted. The conference currently scheduled for January 12, 2023 is adjourned until January 24, 2023 at 2:30 p.m. in Courtroom 12D of 500 Pearl Street, New York, New York 10007. The parties shall file their proposed case management plan by January 19, 2023.

SO ORDERED. Date: January 11, 2023 New York, New York

JOHN P. CRONAN United States District Judge

Re: Martinez Gomez et al v. Dunes Food Group, Inc. et al

Case No: 21-Civ-08051 (JPC)

Your Honor:

This office represents Plaintiff in the above-referenced matter. I write, with consent of Defendants and in accordance with Your Honor's Individual Motion Practice Rules, to respectfully request an adjournment of the conference currently scheduled for January 12, 2023 at 10:30AM, and for additional time to file a proposed case management plan and scheduling order. This is Plaintiff's first request for adjournment.

I make this request because I am the attorney that would be serving as principal trial counsel, and am currently out of town for the week. Defendants' attorney has informed me that he is unavailable January 19, 2023, January 20, 2023, and January 23, 2023. I am also unavailable January 18, 2023 due to a mediation. As such, we respectfully request the new conference date be scheduled in January at a time convenient for this Court, excluding the dates counsel is unavailable, and the deadline to submit a proposed case management plan and scheduling order be extended to the day before the newly scheduled conference date.

We thank this Honorable Court for its attention to this matter.

/s/Frank Palermo
Frank J Palermo
CSM LEGAL
Attorneys for the Plaintiff

cc: All Counsel (via ECF)